

Applicants respectfully disagree with the Examiner's interpretation of this prior art reference. Initially, it is submitted that the Examiner has failed to fully address the claimed limitations of claim 24, in that it requires a coupling controller that operates to receive display preferences regarding multiple displays. Therefore, the Examiner must find this limitation as being performed by a coupling controller. In the present case, the Examiner has asserted a prior art reference that allegedly performs this function through a combination of various structures, but has failed to assert that these structures correspond to the coupling controller, as explicitly claimed in claim 24.

Moreover, the Examiner has further indicated that the coupling controller is taught by Zenda, specifically the expansion slot of the computer as seen in FIG. 2A and 2B. Applicants respectfully disagree with the Examiner's assertion that the coupling controller, as claimed in claim 24, is taught by the expansion slot of Zenda. In support of this position, Applicants direct the Examiner to the claimed limitation of the "coupling controller determining whether a current configuration of the multiple displays to the computer system can be reconfigured such that the display preferences can be fulfilled while maintaining effective configuration of the current configuration when the display preferences cannot be fulfilled." The Examiner is further directed to the page 3, lines 26 through 28 of the present Application, which provides the requisite support for the claimed limitation.

Applicants submit that the expansion slot of Zenda is nothing more than a standard expansion slot, which does not contain any processing ability, but rather only serves as a conduit for the connection of the multiple displays. Applicants directs the Examiner to FIGS. 2A and 2B and col. 7, lines 31 - 41 of Zenda which illustrates that the expansion slot merely provides the interconnection between either a CRT or an LCD display. Therefore, Applicants respectfully submit that the Examiner has improperly characterized the expansion slot of Zenda as being equivalent to the coupling controller of claim 24.

Applicants further submit that Kou fails to teach or discuss display preferences of claim 24 as the coupling controller processes them. The combination of features sighted by the Examiner provide for the conversion of graphics data into video signals which may be provided to the display, but Kou fails, inter alia, to discuss display preferences regarding the particular

display device as processed by a coupling controller. As such, it is improper for the Examiner to assert that it would have been obvious to one of ordinary skill in the art to receive multiple display preferences.

Moreover, Applicants assert confusion regarding the Examiner's cited support for the rejection of claim limitations 24(b) and 24(c). At the top of page 3 in the present office action, the examiner states "Kou teaches all of the claimed limitations of claim 24, except for claim 24(b) and 24(c)." On line 13 of page 3 of the present Office Action, the Examiner states "it would have been obvious to a person of ordinary skill in the art to recognize that Kou discloses as recited in claims 24(b) and 24(c) as claimed."

Applicants respectfully submit that the combination of Kou and Zenda fails to produce the present invention as claimed in claim 24. Zenda teaches the first display controller, which outputs display data to be connected to RAMDAC and displayed on a color LCD panel. Zenda also teaches of a second display controller, which outputs data and is connected to RAMDAC 111 to display data on the color CRT display unit 107. The Examiner asserts these elements correspond to the claim limitation of a plurality of screens. Applicants submit that these references neither individually nor in combination, teach the claim limitations of claim 24, specifically the determination of whether the display preferences can be fulfilled in observance of at least one of: configuration properties of the at least one of the multiple displays and configuration properties of a computing system.

Moreover, Applicants submit the prior art references fail to teach of a coupling controller determining whether a current configuration of the multiple displays to the computing system can be reconfigured such that the display preferences can be fulfilled while maintaining effective configuration of the current configuration when the display preferences cannot be fulfilled. Kou and Zenda further fail to teach of configuring the computing system and the at least one of the multiple displays in accordance with the display preference when the display preferences can be fulfilled, and reconfigure operable coupling of the multiple displays to the computing system such that the at least one of the multiple displays is configured in accordance with the display preferences when the current configuration can be reconfigured.

Applicants further submit the Examiner has failed to address the claimed limitation of the memory storing further programming instructions which cause the processing unit to operably couple a display control of the computing system to the at least one of the multiple displays, the display controller providing display data to the at least one of the multiple displays. The above combination of prior art references further fails to teach causing the processing unit to operably couple the display controller to at least one of the plurality screen memories, each of the plurality of screen memories storing separate display data on the display controller retrieving the display data from the at least one of the plurality of screen memories and causing the processing units to operably couple the display controller to at least one of the plurality of display drivers, each of the plurality of display drivers writing the separate display data to the plurality of screen memories.

As such, Applicants respectfully submit the rejection of claim 24 as being obvious in view of Kou and Zenda is improper, as these references fail to teach or suggest all of the claimed limitations of claim 24.

Regarding claim 33, as stated above, Applicants respectfully submit that the combination of Kou and Zenda fail to teach of the coupling controller of claim 33. Moreover, Applicants respectfully traverse the Examiner characterization of Kou and Zenda teaching the multiple “means for storing” of claim 33. Furthermore, Applicants submit that the combination of Kou and Zenda fail to teach of a “means for storing programming instructions” which cause the processing unit to: “determine whether a current configuration of the multiple display to the computing system can be reconfigured such that the display preferences can be fulfilled while maintaining effective configuration of the current configuration when the display preference cannot be fulfilled.” For the sake of brevity, Applicants submit the combination of Kou and Zenda fails to address the claimed limitations as amended in the Preliminary Amendment, filed in conjunction with a CPA on August 31, 2000.

Regarding the rejection of claims 42-45, applicants assert, as stated above, that the prior art references fail to teach all of the claimed limitations. Specifically, but not exclusively, the prior art references fail to teach of a coupling controller which is operably coupled to receive display preferences and to determine whether the display preferences can be fulfilled in

observance of configuration properties. Moreover, the references failed to teach of these display preferences which are claimed to include at least one of a displaying an image on more than one of the displays, displaying separate images on each of the displays, displaying a portion of the image on one of the displays and displaying the image on another one of the multiple displays, providing different refresh rates for at least two of the displays.

With respect to the rejection of claim 29-32, 38-41, and 46-48 Applicants submit that these claims contain further limitations neither taught nor suggest by the above-noted combination of Kou and Zenda. Regarding claims 29, 38 and 46, Applicants submit that Kou fails to teach of memory, coupled to a process control causing a coupling controller to receive display preferences where the memory comprises programming instructions that cause the processing unit to operably couple a first display controller and a second display controller.

Regarding claims 30, 39 and 47, it is submitted that Kou fails to teach of memory, coupled to a process control causing a coupling controller to receive display preferences where the memory comprises program instructions that cause the processing unit to operably couple a first display controller and a third display controller. Furthermore, with respect to claims 31-32, 40-41 and 48, Kou fails to teach of memory that comprise programming instructions that cause the processing unit to operably couple a first display, a second display, and a third display, or a combination of the displays to one of a plurality of screen memories.

As such, Applicants respectfully submit that the rejection of claims 24, 28-33 and 38-48 as being unpatentable over Kou in view of Zenda is improper. Therefore, Applicants respectfully request the withdrawal of the above rejection and the passage of these claims to issuance.

Regarding the rejection of claims 24, 29-33 and 38-55 under the 35 U.S.C. § 103(a) as being unpatentable over Caine, applicants respectfully traverse this rejection. As stated in response to the previous office action, Applicants reassert that Caine neither teaches nor suggests Applicants' invention as claimed in the present invention. In the previous response, Applicants asserted that Caine fails to teach of a coupling module and that the status register of Caine is not coupled to a coupling module for controlling which screen memory is coupled to which display driver or display controller. Moreover, Applicants asserted that it is not possible for the status

register in Caine to have the same structure or perform the same tasks as the coupling controller of the present invention. In response to these arguments, the Examiner simply reasserted that it would have been obvious to a person of ordinary skill in the art to recognize that Caine discloses a coupling controller as claimed.

Irrespective of the Examiner's broad assertion, Applicants further resubmit that Caine fails to teach of the structure providing for this claimed limitation, specifically, the coupling module. Applicants assert that the Examiner has failed to address this aspect of the Applicants' response, therefore Applicant cannot properly ascertain as to what the Examiner does or does not indicate as the point of obviousness of the present rejection. Moreover, Applicants are limited in fully responding to the Examiner's rejection due to the Examiner failing to fully respond herein. Therefore, Applicants respectfully disagree with the Examiner's assertion of the obvious teaching of Caine disclosing a coupling controller and assert that irrespective of the Examiner's findings, Caine fails to teach limitations of the present invention.

Regarding the rejection of claims 49 – 55, once again the applicant asserts that Caine fails to teach the coupling module. Irrespective of the Examiner's position regarding the obviousness of the teaching of Caine, Caine fails to teach of the structure relating to the coupling module, as it is claimed to be coupled to a plurality of display controllers. Furthermore, it is submitted that the Examiner has failed to support a *prima facie* case for the rejection of claims 49 – 55, as the Examiner has simply made a broad statement regarding the teachings of Caine, but has failed to address them specifically with regard to each limitation as claimed within claims 49 – 55. As such, applicants respectfully request reconsideration and withdrawal of the above-noted rejection of claims 24, 29 – 32, 33 and 38 – 55 as being improperly rejected.

This is intended to be a complete response to a final Office Action (Paper No. 17) mailed August 14, 2001. The Examiner is invited to contact the below-signed attorney if the Examiner believes a telephone conference will advance the prosecution of this application.

Respectfully submitted,

By 

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